



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

SOLID WASTE SECTION

January 10, 2012

Mr. Don Nuss, Regional Environmental Manager
Stericycle, Inc.
1168 Porter Avenue
Haw River, North Carolina 27258

Subject: Determination of Completeness and Technical Review – Permit Amendment, Five (5) Year Renewal
Stericycle, Inc. Haw River – Medical Waste Incinerator Facility
Alamance County, DIN 15882

Dear Mr. Nuss:

The Division of Waste Management (Division) received Stericycle, Inc.'s permit amendment five (5) year renewal application for the Haw River Medical Waste Incinerator Facility on November 21, 2011, entitled:

Stericycle, 1168 Porter Avenue, Haw River, NC 27258, 326-578-8904, INCINERATOR OPERATING PLAN, Revised November 2011. Prepared by Stericycle, Inc. November 2011. DIN 15638.

The Division has performed a review of Stericycle's application for a determination of completeness and determined the application is complete in accordance North Carolina General Statute NCGS 130A-295.8(e). A determination of completeness means the application contains the required components in accordance with North Carolina Administrative Code 15A NCAC 13B .0509 and .1200. In addition to the determination of completeness the Division has completed the technical review of the application and requests that you respond to the following items in order to further process the application;

Operation Plan

1. Section 1.0 Introduction – The Section indicates that the Facility is permitted to treat United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) regulated garbage; submit a copy of the Facility's signed compliance agreement.
2. Section 2.0 Operational Procedures – The Plan refers to reusable containers being washed. The Plan must include procedures and policies for cleaning of reusable containers at the Facility. Note: Water that comes into contact with solid waste will be contained on-site or properly treated prior to discharge.
3. Section 2.0 Operational Procedures – The Plan refers to the landfilling of residual ash. The Plan must include a list of the specific disposal facilities (by name and permit number) that the Facility will transfer waste to, submit a list of disposal facilities.
4. Section 2.0 Operational Procedures – The APHIS Operating Procedures, Appendix B, referenced was not included. Submit a copy of Appendix B (note: no appendices were included in the application).
5. Section 2.1 Waste Receipt and Transportation – Waste Acceptance Protocol, Appendix C, referenced was not included. Submit a copy of Appendix C (note: no appendices were included in the application).



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6. Section 2.1 Waste Receipt and Transportation – The Plan refers to the cleaning and disinfection of vehicles. The Plan must include procedures and policies for cleaning vehicles at the Facility. Note: Water that comes into contact with solid waste will be contained on-site or properly treated prior to discharge.
7. Include in the Plan procedures and policies designed to insure effective vector control measures for flies, rodents, and other insects or vermin at the Facility.
8. Include in the Plan a policy that states; should the Facility close for any reason other than normal business hours and/or operations, the Owner/Operator will notify the Division prior closing and prior re-opening.
9. Include in the Plan a drawing of the Facility which includes; property boundaries, equipment, storage areas, floor drains (Note: All floor drains will discharge directly to an approved sanitary sewage system.), and other important features.
10. Include in the Plan procedures, policies and equipment that insures the Facility meets the following requirements;
 - a. Regulated medical waste shall be subjected to a burn temperature in the primary chamber of not less than 1200 degrees Fahrenheit.
 - b. Automatic auxiliary burners which are capable, excluding the heat content of the wastes, of independently maintaining the secondary chamber temperature at the minimum of 1800 degrees Fahrenheit shall be provided. Interlocks or other process control devices shall be provided to prevent the introduction of waste material to the primary chamber until the secondary chamber achieves operating temperature.
 - c. Gases generated by the combustion shall be subjected to a minimum temperature of 1800 degrees Fahrenheit for a period of not less than one second
 - d. Continuous monitoring and recording of primary and secondary chamber temperatures shall be performed. Monitoring data shall be maintained for a period of three years.
11. Include in the Facility's Operating Plan a section that contains the current Incinerator Ash/Sludge Sampling Plan.

Financial Assurance


12. A financial assurance mechanism must be established prior to issuance of a permit.

Compliance Review

13. You will soon receive, in a separate letter, information regarding a Compliance Review. The Compliance Review must be completed prior to issuance of a permit.

Please address the issues presented in this letter and send your responses to my attention. If you should have any questions regarding this matter you may contact me at (828) 296-4704 or larry.frost@ncdenr.gov.

Sincerely,



Larry Frost
Environmental Engineer

cc: John Patrone – SWS/WSRO
Bill Patrakis – SWS/CO